

morning session

RECEIVED

SEP 30 1999

EIS000053

Oral Comment on the Draft EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.

Tom BUGO

1 The Military Lands Withdrawal Act of 1986 required the preparation of the Special Nevada Report. This report, finalized in September 1991, contains a description of current and proposed defense-related activities in the State of Nevada, an analysis of their impacts, and possible actions that could be taken to mitigate those impacts. The report was prepared jointly by the Departments of the Air Force, Navy, and Interior with the Department of Army and Department of Energy listed as cooperating agencies. Per Section 6(b)(1)(D) of The Act, the Special Nevada Report was mandated to include the lands withdrawn or being considered for withdrawal for use by the Department of Energy.

With respect to water resources, a number of impacts were found to result from the cumulative land withdrawals including the lack of access to potentially developable water resources, water quality impairment, resource consumption by federal agencies, and resource competition with non-federal water users. Page 8-97 of the Special Nevada Report states that:

"The withdrawal of land from public access and/or the purchase of water rights by DOD and DOE has the greatest potential for effects on Nevada....The water resources associated with these lands could, if they exist and were available, play an important role in the continued growth of southern Nevada."

these
The Special Nevada Report is not referenced in the Draft EIS for Yucca Mountain nor are the direct, indirect, or cumulative impacts of federal land withdrawals and water use considered and evaluated. These impacts are significant. The failure of the Draft EIS for Yucca Mountain to incorporate the findings of the Special Nevada Report is a serious inadequacy in the document. The Draft EIS must be revised to include the findings of the Special Nevada Report and must include an evaluation of the cumulative consequences of the land withdrawal for the proposed repository at Yucca Mountain.